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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARIO GONZALEZ,

Defendant.

CASE NO. 2:20-CR-00013-WBS

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;]
FINDINGS AND ORDER

DATE: August 16, 2021
TIME: 9:00 a.m.
COURT: Hon. William B. Shubb

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on August 16, 2021.
2. By this stipulation, defendant now moves to continue the status conference until October 18, 2021 at 9:00 a.m., and to exclude time between August 16, 2021, and October 18, 2021, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes investigative reports, and other media. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.
 - b) Counsel for defendant desires additional time consult with her client, review the

1 current charges, and otherwise prepare for trial.

2 c) Counsel for defendant believes that failure to grant the above-requested
3 continuance would deny him/her the reasonable time necessary for effective preparation, taking
4 into account the exercise of due diligence.

5 d) The government does not object to the continuance.

6 e) Based on the above-stated findings, the ends of justice served by continuing the
7 case as requested outweigh the interest of the public and the defendant in a trial within the
8 original date prescribed by the Speedy Trial Act.

9 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
10 et seq., within which trial must commence, the time period of August 16, 2021 to October 18 ,
11 2021, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
12 T4] because it results from a continuance granted by the Court at defendant's request on the basis
13 of the Court's finding that the ends of justice served by taking such action outweigh the best
14 interest of the public and the defendant in a speedy trial.

15 **[CONTINUED ON NEXT PAGE]**

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: August 11, 2021

PHILLIP A. TALBERT
Acting United States Attorney

/s/ VINCENZA RABENN
VINCENZA RABENN
Assistant United States Attorney


Dated: August 11, 2021

/s/ MARIA PADGETT
MARIA PADGETT
Counsel for Defendant
MARIO GONZALEZ

FINDINGS AND ORDER

IT IS SO FOUND AND ORDERED.

Dated: August 12, 2021


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE